

EXHIBIT A

Monzo Declaration

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE**

In re:

LORDSTOWN MOTORS CORP., *et al.*,¹

Debtors.

Chapter 11

Case No. 23-10831 (MFW)

(Jointly Administered)

**DECLARATION OF ERIC J. MONZO IN SUPPORT OF APPLICATION FOR ENTRY
OF AN ORDER AUTHORIZING THE RETENTION AND EMPLOYMENT OF
MORRIS JAMES LLP AS DELAWARE COUNSEL TO THE OFFICIAL COMMITTEE
OF EQUITY SECURITY HOLDERS *NUNC PRO TUNC* TO SEPTEMBER 7, 2023**

I, Eric J. Monzo, being duly sworn, declare pursuant to 28 U.S.C. § 1746, under penalty of perjury that deposes and says:

1. I am a partner with the law firm of Morris James LLP (“Morris James” or the “Firm”)² with offices located at 500 Delaware Avenue, Suite 1500, Wilmington, Delaware 19801 and am duly admitted to practice law in the State of Delaware, the United States District Court for the District of Delaware, the State of Maryland, the United States District Court for the District of Maryland, the State of New Jersey, the United States District Court for the District of New Jersey, the Commonwealth of Pennsylvania, the United States District Courts for the Eastern and Western Districts of Pennsylvania, and the United States Court of Appeals for the Third Circuit.

2. I submit this Declaration pursuant to Rule 2014 of the Federal Rules of Civil Procedure in support of the *Application for Entry of an Order Authorizing the Retention and Employment of Morris James LLP as Delaware Counsel to The Official Committee of Equity Security Holders Nunc Pro Tunc to September 7, 2023* (the “Application”). The information set

¹ The Debtors and the last four digits of their respective taxpayer identification numbers are: Lordstown Motors Corp. (3239); Lordstown EV Corporation (2250); and Lordstown EV Sales LLC (9101). The Debtors’ service address is 27000 Hills Tech Ct., Farmington Hills, MI 48331.

² Capitalized terms not otherwise defined herein shall have the meanings ascribed to such terms in the Application.

forth herein regarding connections to parties-in-interest and fees and expenses is based primarily upon books and records of the Firm and information provided by other attorneys and personnel at Morris James. Except as otherwise indicated herein, I have personal knowledge of the matters set forth herein, which is true and correct, and if called as a witness, would testify competently thereto.

3. In preparing this declaration, I and other attorneys within the Firm followed Morris James' conflict procedures, which are intended to adhere to the requirements of the Bankruptcy Code and Bankruptcy Rules for retention of professionals and the Rules of Professional Conduct governing members of the bar for the State of Delaware. I have received a list of significant interested parties in this case and submitted the names of these parties through the Firm's conflicts resolution system.

4. In connection with preparing this Declaration, Morris James submitted the names of parties-in-interest in the Chapter 11 Cases (the "Parties-in-Interest") for review in the computerized conflict database system maintained by Morris James. The list of the Parties-in-Interest was obtained from the above-captioned Debtors. Morris James maintains and systematically updates its conflict check system in the regular course of business of the Firm, and it is the regular practice of the Firm to make and maintain these records. The conflict check system maintained by Morris James is designed to include every matter on which the Firm is now or has been engaged, the entity for which the Firm is now or has been engaged, and in each instance, the identity of related parties and adverse parties and the attorney in the Firm that is knowledgeable about the matter. It is the policy of Morris James that no new matter may be accepted or opened within the Firm without completing and submitting to those charged with maintaining the conflict check system the information necessary to check each such matter for conflicts, including the

identity of the prospective client, as well as related and adverse parties. Accordingly, the database is regularly updated for every new matter undertaken by Morris James.

5. The Parties-in-Interest which Morris James submitted to its conflict database include, but are not limited to, the following categories derived from various pleadings and docket entries as set forth on **Exhibit 1**, and as provided by the Debtors, affiliates & subsidiaries, present and former directors and officers, senior employees, top unsecured creditors, banks, significant lease and contract parties, significant vendors, customers, investors with over 5% holdings, restructuring and ordinary course professionals, insurance parties, utility providers, litigation parties, lien holders, bankruptcy court judges and staff, and Office of the U.S. Trustee, Region 3, as set forth therein.

6. Upon a review of the report generated by our conflicts search, I do not represent and, to the best of my knowledge, none of the other attorneys of Morris James currently represent any of the searched entities except as set forth on the schedule annexed hereto as **Exhibit 2**. The various matters set forth on **Exhibit 2** are unrelated to the Debtors or the Chapter 11 Cases.

7. I do not have and, to the best of my knowledge, none of the other attorneys of Morris James have, any connection with the Debtors, their major creditors, or any other significant Party-in-Interest which would disqualify Morris James from this representation.

8. Based on the conflicts and connection search conducted and described herein, to the best of my knowledge, neither I, or Morris James, nor any partner, counsel, or associate thereof, insofar as I have been able to ascertain, have any connection with the Debtors or any other Parties-in-Interest herein, except as stated below and as set forth on **Exhibit 2**.

9. Brya M. Keilson, Partner with the Firm, was a trial attorney at the Office of the United States Trustee for Region 3 until March 13, 2019. During her tenure at the United States

Trustee's Office, she did not work on this matter. In accordance with Bankruptcy Rule 2014, Morris James does not have any other connection with the Office of the United States Trustee for the District of Delaware, or any persons employed by the United States Trustee, except as set forth on **Exhibit 2**.

10. Jeffrey R. Waxman previously served as a law clerk for the Honorable Mary F. Walrath, United States Bankruptcy Judge. The Honorable Kent A. Jordan of the Third Circuit Court of Appeals was formerly associated with Morris James as an attorney in private practice. The Honorable Thomas M. Horan was formerly associated with Morris James as an attorney in private practice. In accordance with Bankruptcy Rule 2014, Morris James does not have any other connection with the Bankruptcy Court Judges and Staff (including visiting Judges), District Judges (including visiting Judges), District Magistrate Judges (including visiting Judges), except as set forth on **Exhibit 2**.

11. From time to time, Morris James may represent, or may have represented one or more of the Debtors' creditors or other parties in matters unrelated either to the Debtors' Chapter 11 Cases or to those entities' transactions or dealings with the Debtors. The Firm, however, is not representing any of those entities in the Chapter 11 Cases in any claims that they may have collectively or individually against the Debtors.

12. Neither I, Morris James, nor any partner, counsel, or associate thereof, insofar as I have been able to ascertain, has any connection with the Debtors, its creditors, or any other Parties-in-Interest herein, or their respective attorneys and accountants, except as stated herein.

13. Morris James has previously worked with and may continue to work with one or more of the Debtors' professionals on various representations in matters unrelated to the Chapter

11 Cases, at times representing the same parties and at other times representing parties with similar interests or parties with adverse interests.

14. Morris James is a “disinterested person” as that term is defined in section 101(14) of Title 11 of the United States Code, 11 U.S.C. §§ 101 et seq. (the “Bankruptcy Code”), as modified by section 1103(b) of the Bankruptcy Code, in that the Firm, its partners, counsel, and associates:

- a. are not creditors, equity security holders or insiders of the Debtors;
- b. are not and were not within two (2) years before the date of the filing of the Debtors’ Chapter 11 petition, a director, officer, or employee of the Debtors; and
- c. do not have an interest materially adverse to the interest of the Debtors’ estate or of any class of creditors or equity security holders, by reason of any direct or indirect relationship to, connection with, or interest in, the Debtors, or for any other reason, except as disclosed herein.

15. As of the date hereof, the Firm has conducted a review of potential conflicts as to the entities identified at **Exhibit 1** hereto. Morris James has followed its standard conflict procedures with respect to potential conflicts, and Morris James is aware of its continuing obligation to review and supplement its conflict review pursuant Bankruptcy Rule 2014 and Local Bankruptcy Rule 2014-1. Morris James and certain of its partners, counsel and associates may have in the past represented, and may currently represent and likely in the future will represent interested parties in connection with matters unrelated to the Chapter 11 Cases. A list of potential conflicts, including parties in which Morris James has any connection to, including those it represented and currently represents in unrelated matters is attached hereto as **Exhibit 2**.

16. Morris James will not represent any of the entities identified on **Exhibit 1** in their individual capacities in the Chapter 11 Cases. As appropriate, other counsel will serve as

Committee counsel for such matters, or the Committee will seek approval of retention of additional conflicts counsel.

17. The Firm intends to apply for compensation for professional services rendered in connection with the Chapter 11 Cases subject to approval of this Court and compliance with applicable provisions of the Bankruptcy Code, on an hourly basis, plus reimbursement of actual, necessary expenses and other charges incurred by the Firm. Although Morris James may utilize the services of additional attorneys, the principal attorneys and paralegals likely to represent the Committee in this case are as follows:

<u>Individual</u>	<u>Position</u>	<u>Hourly Rate</u>
Eric J. Monzo	Partner	\$795.00
Brya M. Keilson	Partner	\$750.00
Jason S. Levin	Associate	\$450.00
Christopher M. Donnelly	Associate	\$385.00
Stephanie Lisko	Paralegal	\$350.00
Douglas J. Depta	Paralegal	\$350.00

Other attorneys and paralegals may from time to time assist the Committee in connection with the matters herein described and are subject to periodic adjustment to reflect economic or other conditions.

18. The hourly rates set forth above are the Firm's standard hourly rates for work of this nature and are subject to modification annually effective as of January 1st. These rates are set at a level designed to fairly compensate the Firm for the work of its attorneys and paralegals and to cover fixed and routine overhead expenses. The expenses charged include, among other things, telephone and telecopy toll and other charges, mail and express mail charges, special or hand delivery charges, document retrieval, photocopying charges, charges for mailing supplies (including, without limitation, envelopes and labels) provided by the Firm to outside copying services for use in mass mailings, travel expenses, expenses for "working meals," computerized

research, and transcription costs. Any such expenses will be recorded in accordance with Morris James' customary practices and will be incurred at the same rate as customarily charged in similar engagements or as otherwise limited by the local rules of the Court.

19. Subject to Court approval, and in consultation with lead counsel Brown Rudnick LLP ("Brown Rudnick"), so as to avoid duplication, the professional services that Morris James will render to the Committee include, but shall not be limited to, the following:

- Provide legal advice and assistance to the Committee in its consultation with the Debtors relative to the Debtors' administration of its reorganization and the Chapter 11 Cases;
- Review and analyze all applications, motions, orders, statements of operations, and schedules filed with the Court by the Debtors or third parties, advise the Committee as to their propriety, and after consultation with the Committee, take appropriate action;
- Prepare necessary applications, motions, responses, answers, orders, reports, and other legal papers on behalf of the Committee;
- Represent the Committee at hearings held before the Court and communicate with the Committee regarding the issues raised, as well as the decisions of the Court; and
- Performing such other legal services to the Committee in connection with the prosecution of the Chapter 11 Cases as are necessary and appropriate.

20. In addition to the services listed above, Morris James, in accordance with Delaware counsel's obligations, will prepare and review all pleadings, motions, responses, objections, and other documents prepared on behalf of the Committee. Morris James will assure that any pleadings comply with the Local Rules. Morris James will advise the Committee on matters of Delaware practice and procedure and Delaware law. Morris James has substantial experience in Delaware courts and dealing with issues in the Court. A Morris James attorney will also personally attend all proceedings before the Court and will attend all meetings in Delaware between the Committee,

the Debtors, and/or Parties-in-Interest at which Committee counsel is requested, or required, to be present after consulting with lead counsel. Morris James will also, upon identification of such matters, handle any matters where lead counsel has determined that it has a conflict to ensure compliance with the United States Trustee Guidelines.

21. Pursuant to Part F of the 2013 U.S. Trustee Guidelines, Morris James is proposed to serve as Delaware co-counsel for the Committee with Brown Rudnick. In the Application and this Declaration, I disclose, in general, the services to be provided to the Committee by Morris James. In some cases, the description of these services may appear duplicative of the services set forth in Brown Rudnick's retention application. Morris James expects that there will be occasions where Brown Rudnick will take the lead role in drafting or responding to pleadings, or otherwise addressing issues. On other occasions, Morris James will be tasked to take the lead on issues and matters. In such instances, Morris James and Brown Rudnick do not expect to duplicate services.

22. To the extent that Morris James is assigned by the Committee, in consultation with Brown Rudnick, to perform new matters as requested by the Committee that may be necessary and proper in these proceedings and that are materially different from the above described services and the services described in the Application or this Declaration, Morris James will file a supplemental declaration in accordance with Bankruptcy Rule 2014, as required by Part F.1.c of the United States Trustee Guidelines.

23. No promises have been received by the Firm nor by any partners, counsel, or associate thereof as to compensation in connection with the Chapter 11 Cases other than in accordance with the provisions of the Bankruptcy Code. The Firm has no agreement with any other entity to share with such entity any compensation received by the Firm in connection with the Chapter 11 Cases, except among the partners, counsel, and associates of the Firm.

24. To the extent that the Firm discovers any connection with any interested party or enters into any new relationship with any interested party, the Firm will promptly supplement its disclosure to the Court.

25. In order to comply with the United States Trustees' Appendix B – Guidelines for Reviewing Applications for Compensation and Reimbursement of Expenses Filed under 11 U.S.C. § 330 by Attorneys in Larger Chapter 11 Cases, as required to be answered in all applications for employment filed under section 327 or 1103 of the Bankruptcy Code, which became effective on November 1, 2013, I make the following disclosures:

- a. Morris James did not agree to a variation of its standard or customary billing arrangements for this engagement;
- b. None of the professionals included in this engagement have varied their rate based upon the geographic location of the Chapter 11 Cases; and
- c. The Committee retained Morris James on September 7, 2023. The billing rates for the period prior to this application are the same as indicated in this application;
- d. Morris James anticipates filing a budget at the time it files its interim fee applications, and any such budget it may file will be prior approved by the Committee. In accordance with the United States Trustee Guidelines, the budget may be amended as necessary to reflect changed circumstances or unanticipated developments.

The facts set forth in the Application and herein are true and correct to the best of my knowledge, information, and belief.

Dated: September 27, 2023

/s/ Eric J. Monzo

Eric J. Monzo (DE Bar No. 5214)

Exhibit 1 to Monzo Declaration

Debtor Entities

1. Lordstown Motors Corp. (DE)
2. Lordstown EV Corp. (DE)
3. Lordstown EV Sales LLC (DE)

Related/Former Names of Entities

1. DiamondPeak Holdings Corp. (n/k/a Lordstown Motors Corp.)
2. DPL Merger Sub Corp. (n/k/a Lordstown EV Corporation)
3. MIH EV Design, LLC

Directors and Officers

1. Adam Kroll
2. Angela Strand
3. Dale Spencer
4. Daniel Ninivaggi
5. David T. Hamamoto
6. Donna Bell
7. Edward T. Hightower
8. Jane Reiss
9. Joseph B. Anderson Jr.
10. Keith Feldman
11. Laura Soave
12. Melissa Leonard

Former Directors and Officers

1. Jane Ritson-Parsons
2. John LeFleur
3. John R. Whitcomb
4. Michael Gates
5. Mickey Kowitz
6. Martin Rucidlo
7. Rebecca Roof
8. Stephen S. Burns
9. Thomas V. Canepa

Senior Employees

1. Cheryl Johnson
2. Darren Post
3. Jill Coniglio-Kirk
4. Carter Driscoll
5. Michael Port
6. Raghu Aerabati
7. Waqar Hashim
8. Andrew Reyntjes

Top Unsecured Creditors

1. Amphenol Interconnect Products Corporation
2. AP Expert Group LLC
3. AT&T MOBILITY-CC
4. Barry L. Leonard and Company Inc. dba Trans Machine Technologies
5. Bossard Inc.
6. CEVA Contract Logistics US Inc
7. Cognizant Mobility, Inc
8. Elaphe Propulsion Technologies LTD
9. Fiberdyne Research Pty Ltd
10. Filec Production SAS - Amphenol
11. Foxconn EV System LLC
12. Greatech Intergration (M) SDN.BHD.
13. Harco Manufacturing Group, LLC
14. HRB Industries Corp.
15. JVIS USA LLC
16. Laval Tool & Mould LTD.
17. Marelli North America Inc dba CalsonicKansel North America Inc
18. Meta Systems SpA
19. Nexteer Automotive Corporation
20. Pektron EV Limited
21. Proper Group Holdings LLC dba Proper Tooling LLC
22. Quality MetalCraft Inc.
23. SA Automotive LTD
24. Sharp Dimension Inc
25. St. Clair Technologies Inc.
26. Superior Cam Inc
27. Technology Solutions Anywhere LLC dba Readysoft
28. Teijin Automotive Technologies, Inc
29. The Timken Corporation
30. Three-Dimensional Services dba 3 Dimensional Services Group
31. thyssenkrupp Materials NA, Inc. dba Ken-Mac Metals or thyssenkrupp Steel Services
32. Ventra Group Co. dba Flex-N-Gate Bradford
33. VIA Optronics LLC

34. Zetwerk Manufacturing USA, Inc.
35. ZF Passive Safety Systems US Inc.

Cash Management Banks

1. JP Morgan Asset Management
2. JP Morgan Chase Bank, N.A.
3. JP Morgan Institutional Investments Global Liquidity
4. JP Morgan Prime
5. JP Morgan Securities

Significant Lease and Contract Counterparties

1. 275 Hills Tech Ventures LLC
2. Aon (Bermuda) Ltd.
3. Aon Risk Services Central Inc.
4. Aon UK Limited
5. Arthur J. Gallagher Risk Management Services, Inc.
6. Applied Medical Resources Corporation
7. Cigna Health and Life Insurance Company
8. Elaphe Propulsion Technologies Ltd.
9. Foxconn EV Property Development LLC
10. Foxconn EV System LLC
11. GAC R&D Center Detroit, LLC
12. General Motors
13. GM EV Holdings LLC
14. Liberty Property and Asset Management
15. Michigan Strategic Fund
16. Paylocity Corporation
17. Principal Life Insurance Company
18. TenantBase, Inc.
19. TransAmerica Corporation
20. Willowgreen Building Group, LLC
21. Workhorse Group Inc.

Significant Vendors

1. A Say Inc dba Say Communications LLC
2. A.K.Stamping Company, Inc
3. ABSOLUTE ELECTRONICS INC
4. Akebono Brake Company
5. Amphenol Interconnect Products Corporation
6. Anchor Tool and Die Company dba Anchor Manufacturing Group, Inc.
7. Anderton Castings SAS
8. AP Expert Group LLC
9. Armada Toolworks LTD.

10. AT&T MOBILITY-CC
11. ATCO Industries, Inc.
12. Auto Motive Power Inc
13. Baker Hostetler
14. Barry L. Leonard and Company Inc. dba Trans Machine Technologies
15. Bennie W Fowler, LLC
16. Bossard Inc.
17. Brikho & Kallabat, P.C. DBA Joseph Kallabat and Associates, PC
18. CEVA Contract Logistics US Inc
19. CEVA International, Inc
20. CITIC Dicastal Co., Ltd.
21. Cognizant Mobility, Inc
22. Cognizant Worldwide Limited
23. Complete Discovery Source, Inc (CDS)
24. Contour Hardening Inc.
25. Cox Automotive Mobility Solutions, Inc
26. Cox Automotive, Inc - Manheim
27. Custodial Building Services, Inc
28. DAG LTD, LLC
29. Detroit Engineered Products dba DEP
30. Duggan Manufacturing LLC
31. Elaphe Propulsion Technologies LTD
32. Fiberdyne Research Pty Ltd
33. Filec Production SAS - Amphenol
34. Foshan Aoya Electrical and Mechanical Co., Ltd.
35. Foxconn EV Property Development LLC
36. Foxconn EV System LLC
37. Greatech Intergration (M) SDN.BHD.
38. Harco Manufacturing Group, LLC
39. Haynes and Boone, LLP
40. HRB Industries Corp
41. HubSpot Inc
42. IEE S.A.
43. Infosys Limited
44. Jiangyin Haida Rubber and Plastic Co., Ltd. dba Haida
45. JVIS USA LLC
46. KPMG LLP
47. Lasky, LLC
48. Laval Tool & Mould LTD.
49. Logicalis, Inc.
50. Lumma Clean LLC
51. Mahle Behr USA Inc
52. Mainfreight, Inc - Canada
53. Mainfreight, Inc.
54. Marelli North America Inc dba CalsonicKansel North America Inc
55. Megatronix (Beijing) Technology Co., Ltd.

56. Meta Systems SpA
57. Miotti Srl
58. Mosaic Corporation
59. MSSC US INC.
60. New Eagle, LLC
61. Nexteer Automotive Corporation
62. OpenText Inc.
63. Payscale Inc
64. Pektron EV Limited
65. Pi Innovo LLC
66. Pierburg US LLC
67. Potter Anderson & Corron LLP
68. Principal Life Insurance Company
69. Proper Group Holdings LLC dba Proper Tooling LLC
70. Quality MetalCraft Inc.
71. Racar Engineering, LLC
72. Ready Logistics, LLC
73. Roush Industries, Inc.
74. RTL Systems, LLC
75. SA Automotive LTD
76. Schwab Industries, Inc.
77. SG Automotive d.o.o.
78. Sharp Dimension Inc
79. Sherpa Commercial Vehicles, LLC
80. Silverman Consulting, Inc
81. Simpson Thacher & Bartlett LLP
82. Socotec Advisory, LLC
83. St. Clair Technologies Inc.
84. Sullivan & Cromwell LLP
85. Superior Cam Inc
86. Sybridge Technologies Canada, Inc
87. Technology Solutions Anywhere LLC dba Readysoft
88. Teijin Automotive Technologies, Inc
89. TERIS - Phoenix LLC DBA TERIS
90. The Timken Corporation
91. Three-Dimensional Services dba 3 Dimensional Services Group
92. thyssenkrupp Materials NA, Inc. dba Ken-Mac Metals or thyssenkrupp Steel Services
93. Transportation Research Center, Inc. dba TRC, Inc.
94. Triple Crown Consulting, LLC
95. TTI, INC dba Symmetry Electronics (a division of TTI, Inc.) and RFMW(a division of TTI, Inc.)
96. Ventra Group Co. dba Flex-N-Gate Bradford
97. VIA Optronics LLC
98. Victora Auto Private Limited
99. Zetwerk Manufacturing USA, Inc
100. ZF PASSIVE SAFETY SYSTEMS US INC.

Customers

1. Army Contracting Command - Detroit Arsenal (ACC-DTA)
2. City of Washington, D.C.
3. Greenstreet EV Inc.
4. JoeyB QB LLC
5. Pratt & Miller Engineering & Fabrication LLC
6. San Diego Unified Port District
7. Sherpa Commercial Vehicles LLC

Investors with over 5% Holdings

1. Foxconn (Far East) Limited
2. Foxconn EV Technology, Inc.
3. Foxconn Ventures Pte. Ltd.
4. Foxteq Holdings Inc.
5. Foxteq Integration Inc.
6. Hon Hai Precision Industry Co., Ltd.
7. Hon Hai Technology Group
8. PCE Paragon Solutions Kft.

Debtor Restructuring Professionals

1. Jefferies Group LLC
2. Kurtzman Carson Consultants, LLC
3. Richards Layton & Finger, P.A.
4. Silverman Consulting, Inc.
5. White & Case LLP

Ordinary Course Professionals & Professionals of Parties in Interest

1. Akin Gump Strauss Hauer & Feld LLP
2. Ankura Intermediate Holdings, LP dba Ankura Consulting Group LLC
3. Baker & Hostetler LLP
4. Bernstein Litowitz Berger & Grossman, LLP
5. Bodman PLC
6. Climaco, Wilcox, Peca, Tarantino & Garofoli
7. Cohen Rosenthal & Kramer
8. Cooch and Taylor
9. Cummins Law
10. deLeeuw Law LLC
11. Dechert LLP
12. Deloitte & Touche LLP
13. Dentons US
14. Dittmer, Wagoner & Steele
15. Elfvin, Klingshirn, Royer & Torch, LLC

16. Employment Law Partners
17. Entwistle & Cappucci LLP
18. Ernst & Young U.S. LLP
19. Fisher and Phillips LLP
20. Foley & Lardner LLP
21. FTI Consulting, Inc.
22. Gladstein, Neandross & Associates
23. Hagens Berman Sobol Shapiro LLP
24. Haynes and Boone, LLP
25. Kaskela Law LLC
26. Kooperman Mentel Ferguson Yaross
27. KPMG LLP
28. Labaton Sucharow LLP
29. Latham & Watkins LLP
30. Law Office of Daniel R. Karon
31. Lasky, LLC
32. Lifshitz Law PLLC
33. Long Law, LLC
34. Mercer Capital Management, Inc.
35. Merriman Legando Williams & Klang
36. Murray, Murphy, Moul & Basil
37. Nelson Mullins Riley & Scarborough LLP
38. Paul Hastings LLP
39. Perantinides & Nolan
40. Perez & Morris
41. Phillips ADR Enterprises PC
42. Pomerantz LLP
43. Potter Anderson & Corroon LLP
44. Prospect Law LLP
45. Purcell & Lefkowitz LLP
46. Robbins Geller Rudman & Dowd
47. RSM US LLP
48. Saxena White
49. Schall Law
50. Schubert Jonckheer & Kolbe LLP
51. Seyfarth Shaw LLP
52. Shapiro Haber & Urmy LLP
53. Simpson Thacher & Bartlett LLP
54. Socotec Advisory, LLC
55. Strauss Troy
56. Sullivan & Cromwell LLP
57. The Brown Law Firm, P.C.
58. The Rosen Law Firm, P.A.
59. Winston & Strawn LLP
60. WIT Legal, LLC
61. Zoll & Kranz

Insurance Parties

1. Accredited Specialty Insurance Company
2. Allied World Specialty Insurance Company
3. Associated Industries Insurance Co., Inc
4. AXIS Insurance Company
5. Berkley Insurance Company
6. CFC Underwriting / Lloyds
7. Continental Casualty Company
8. Endurance Assurance Corporation
9. Fair American Insurance & Reinsurance Co
10. Gemini Insurance Company
11. General Star Indemnity Company
12. Hudson Insurance Company
13. Ironshore Specialty Insurance Company
14. Magna Carta Insurance Ltd. / Lloyds
15. National Union Fire Ins Co of Pittsburgh, PA
16. RSUI Indemnity Company
17. RT Specialty Insurance Services, LLC
18. Samsung Fire & Marine Ins Co Ltd (US Br)
19. SiriusPoint Bermuda Insurance Company
20. The Cincinnati Indemnity Company
21. The Cincinnati Insurance Company
22. Underwriters At Lloyds London
23. Westfield Specialty Insurance Comp
24. XL Specialty Insurance Company

Utilities

1. AT&T Business Direct
2. AT&T MOBILITY-CC
3. Comcast Holdings Corporation dba Comcast Cable Communication Management LLC
4. Cox Communications California LLC dba Cox Business
5. CR&R Environmental Services
6. Detroit Disposal & Recycling
7. Irvine Ranch Water District
8. Sonitrol Orange County
9. Southern California Edison
10. Southern California Gas Company dba The Gas Company; So Cal Gas

Taxing and Regulatory Authorities

1. California Franchise Tax Board
2. California Department of Tax and Fee Administration
3. California State Board of Equalization
4. Committee on Foreign Investment in the United States

5. Delaware Secretary of State
6. Delaware State Treasury
7. Delaware Tax Authority
8. Internal Revenue Service
9. Michigan Department of Treasury
10. National Highway Traffic Safety Administration
11. Ohio Bureau of Workers' Compensation
12. Ohio Department of Taxation
13. Orange County Property Taxes
14. Pipeline and Hazardous Materials Safety Administration
15. Securities and Exchange Commission
16. U.S. Department of Justice
17. U.S. Patent and Trademark Office
18. Village of Lordstown, OH Income Tax Department

Litigation Parties

1. Alicia Kelley
2. An Thai
3. Andrew C. Richardson
4. Angela Strand Boydston
5. Ashith Pabbathi
6. Atri Amin
7. Bei Qin
8. Benjamin Herbert
9. Caimin Flannery
10. Carole Cooper
11. Christopher Kim
12. Chuan D. Vo
13. Claude L. Patterson
14. Dale G. Spencer
15. Dan Zhihong Huang
16. Daniel J. Cohen
17. Daniel Tavares
18. Dari Tehrani
19. Darren Post
20. David M. Cohen
21. David T. Hamamoto
22. Ed Lomont
23. Eskander Tehrani
24. Ethan Fingerer
25. Evaristo Sarabia
26. FNY Managed Accounts LLC
27. George Troicky
28. Globestar Systems Inc.
29. Gurpreet Singh

30. Herbert Stotler
31. Hong Xin Huan (a/k/a George Huan)
32. Jane Reiss
33. Janelle Jackson
34. Jesse Brury
35. John H. Jenkins
36. John LeFleur
37. John Vo
38. Joshua Betof
39. Judith A. Hannaway
40. Julio C. Rodriguez
41. Karma Automotive LLC
42. Keith A. Feldman
43. Kenneth Davenport
44. Kevin Levent
45. Kin San Chan
46. M.R.S. Leasing Corporation LTD
47. Mario Guerrero
48. Mark A. Walsh
49. Martin J. Rucidlo
50. Matthew Rico
51. Michael Fabian
52. Michael D. Gates
53. Mickey W. Kowitz
54. Mohammed Chowdhury
55. Phil Richard Schmidt
56. Pnina Cohen
57. Punak Engineering, Inc.
58. Randy Slipher
59. Raymond Romano
60. Robert Miller
61. Robert Palumbo
62. Roger J. Durre
63. Shane Brown
64. Simha Cohen
65. Stephen Punak
66. Stephen S. Burns
67. Steven R. Hash
68. Steven Terry
69. Sulayman Zuod
70. DiamondPeak Sponsor LLC
71. Silverpeak and related entities (which includes SP SPAC Sponsor LLC, Silverpeak Real Estate Partners L.P., Silverpeak Strategic Partners LLC, Silverpeak Credit Partners LP, Silverpeak Renewables Investment Partners LP, and certain other affiliated entities)

Lien Holders

1. Competition Engineering, Inc.
2. Foxconn EV Technology, Inc.
3. Hewlett-Packard Financial Services Company
4. Peterson Jig and Fixture, Inc.
5. Precision Jig and Fixture
6. Proper Tooling, LLC & Proper Group International, LLC

Office of the United States Trustee (Wilmington, DE)

1. Andrew Vara
2. Benjamin Hackman
3. Christine Green
4. Denis Cooke
5. Diane Giordano
6. Dion Wynn
7. Edith A. Serrano
8. Hannah M. McCollum
9. Holly Dice
10. James R. O'Malley
11. Jane Leamy
12. Joseph Cudia
13. Joseph McMahon
14. Juliet Sarkessian
15. Karen Starr
16. Lauren Attix
17. Linda Casey
18. Linda Richenderfer
19. Michael Panacio
20. Nyanquoi Jones
21. Richard Schepacarter
22. Rosa Sierra-Fox
23. Shakima L. Dortch
24. Timothy J. Fox, Jr.

United States Bankruptcy Judges in the District of Delaware

1. Ashley M. Chan
2. Brendan L. Shannon
3. Craig T. Goldblatt
4. John T. Dorsey
5. Karen B. Owens
6. Kate Stickles
7. Laurie S. Silverstein
8. Mary F. Walrath
9. Thomas M. Horan

Other Parties in Interest

1. Softbank
2. Blackrock Institutional Trust Company, N.A.
3. Blackrock

Exhibit 2 to Monzo Declaration

<u>CLIENT</u>	<u>RELATIONSHIP TO DEBTORS</u>	<u>MATTER</u>
Fox, Jr., Timothy J.	Office of the United States Trustee (Wilmington, DE)	The Firm previously represented an individual named Timothy Fox in a non-bankruptcy matter unrelated to these Chapter 11 Cases.
General Motors	Significant Lease and Contract Counterparties	The Firm previously represented and has been adverse to General Motors LLC in matters unrelated to these Chapter 11 Cases.
Jefferies Group LLC	Debtor Restructuring Professionals	The Firm previously represented an entity that may have been or is an affiliate of Jefferies Group LLC in a matter unrelated to these Chapter 11 Cases.

(MORRIS JAMES' CONFLICT RESOLUTION PROCEDURE IS ONGOING, AND MORRIS JAMES WILL UNDERTAKE TO SUPPLEMENT THIS DECLARATION AS NECESSARY)